



**Commonwealth Edison**  
1400 Ohio Place  
Downers Grove, Illinois 60515

August 17, 1994

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington D.C. 20555

Attention: Mr. William T. Russell

Subject: **Inservice Testing Program Plan for Pumps and Valves**  
**Program scope update**

Byron station Units 1 and 2  
(NPF-37/66; NRC Docket Nos. 50-454/455)

Braidwood Station Units 1 and 2  
(NPF-72/77; NRC Docket Nos. 50-456/457)

Dear Mr. Russell:

During two recent regional inspections of the Inservice Testing (IST) program (May, 1993 at Braidwood and January, 1994 at Byron), a weakness in the program scope was identified. Byron and Braidwood Stations committed to jointly review the scope of the IST program and develop a scoping basis document. This scoping effort was being performed in accordance with the scoping guidelines found in ASME/ANSI OM-1988, Parts 6 and 10. The use of OM-6 and OM-10 will enable this -- to be used for Byron's ten-year (second interval) program update.

The program scope review was completed on June 30, 1994. The scope review identified that 90 and 74 valves (two unit total) need to be added to Byron and Braidwood's programs, respectively. Both sites intend to aggressively pursue initial testing of all the identified valves; however, several of the valves being added can only be tested in plant conditions achieved during a cold shutdown or refueling outage. Because of this, the sites have designated the valves into one of 3 test implementation groups:

- Group 1 - Unit 1 and Common Cold Shutdown/Refueling
- Group 2 - Unit 2 Cold Shutdown/Refueling
- Group 3 - Normal Quarterly test

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Both sites intend to test Groups 1 and 2 valves during the appropriate upcoming outages. Group 3 valves will be tested at normally scheduled quarterly intervals. For Byron Station, all new valves will receive initial testing by the completion of the upcoming Unit 2 refueling outage (current completion date of 4/16/95). Similarly, Braidwood plans on completing all initial valve testing by the end of the upcoming Unit 1 refueling outage (current completion date is 10/95).

The following details the site specific implementation plan:

**Byron's Schedule**

**Implementation Plan**

09/14/94	Submit IST Program revision including additional scope.
09/30/94 - 11/12/94	*Begin implementation of quarterly tests (Group 3) and of valves identified as Refueling Outage/Cold Shutdown for Unit 1 (Group 1)
02/95 - 04/16/95	Begin implementation of testing valves identified as Refueling Outage/Cold shutdown for Unit 2 (Group 2). Quarterly testing (Group 3) implementation continues.
04/16/95	All newly identified valves have been initially tested and are being tested per frequency requirements.

- Please note that this implementation schedule reflects testing of the Group 3 valves from 9/30/94 to 4/16/95. This timeframe is necessary because of the resources required to support the testing of Group 1 & 2 valves during the Unit 1 & 2 outages, which are scheduled within a short timeframe.